8-15-12

NEW JERSEY DE .RTMENT OF ENVIRONMENTAL P. TECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
HAZARDOUS WASTE INSPECTION REPORT

DWM-029

## GENERATOR INSPECTION REPORT

### FACILITY INFORMATION

FACILITY NAME: COLOR-DEC

FILE NUMBER: _____

VHT FACILITY FILE NUMBER: _____

PERMIT #: N/A - 90 DAY GENERATOR

REGION: 5

INSPECTION DATE: MAY 2, 1988

INCIDENT/CASE NUMBER: N/A

INSPECTION TYPE: ~~CME~~ GEN. CEI (FO)

RESPONSIBLE AGENCY CODE: _____

INSPECTOR'S NAME: JACK ALLEN

INSPECTOR'S AGENCY: NJDEP/DIV. HAZ. WASTE MGT.

INSPECTOR'S BUREAU: FIELD OPERATIONS

EPA ID NUMBER: NJD064362379

ADDRESS:
430 ANDERO DRIVE
PITMAN, NEW JERSEY 08071

LOT: 4 BLOCK: 140

COUNTY: GLOUCESTER

FACILITY PERSONNEL: ERIC NEAVES - DIRECTOR OF RESEARCH
W BRIAN ANDERSON - PRESIDENT

TELEPHONE #: (609) 589-3800

OTHER STATE/EPA PERSONNEL: J SANDERSON - USEPA/REG. II
TOM MOY - USEPA/REG. II

REPORT PREPARED BY: JACK ALLEN

REVIEWED BY: Terry W. Ostrander

DATE OF REVIEW: 5/24/88

DIVISION: 2

TIME IN: 1130 HOURS

TIME OUT: 1630 HOURS

PHOTOS TAKEN (X) YES (__) NO IF YES, HOW MANY? 10

SAMPLE TAKEN (__) YES (X) NO NO. OF SAMPLES _____

NJDEP SAMPLE ID#: _____

MANIFESTS REVIEWED (X) YES (__) NO

Number of manifests in compliance *ALL

Number of manifests not in compliance _____

List manifest document numbers of those manifests not in compliance.

* NOTE. SEE LAB BAN SECTION OF REPORT

## SUMMARY OF FINDINGS

**FACILITY DESCRIPTION AND OPERATIONS:**

Color Dec is a wholly owned subsidiary of Decorating Resources, Inc., which is headquartered at the same location. Decorating Resources is divided into two seperate divisions; AndBro and Color Dec. Both divisions are operated at the same location and collectively employ approximatly 200 people working one shift, 5 days per week.

Color-Dec is the division which prints plastic ink onto unsupported plastic film (mylar). The mylar is used as a vehicle for the plastic ink.

AndBro division then transfers the print from these labels onto the product container.

Color Dec operates four (4) printing presses at this location. Two (2) presses are the roto gravure type which use etched copper cylinders for applying ink to the mylar. One of these roto gravure units is smaller, capable of working in one color only. The second is much larger, capable of multi-color printing. The remaining two (2) printing presses operate on the silk screen principal. One (1) of these silk screen presses is large and is most often in use. The second silk screen unit is a small prototype not in use at the time of this inspection.

The copper cylinders on the roto gravure units are cleaned by plant personel by applying a small amount of solvent (n-propyl acetate) to a disposable cloth and wiping down the units.

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## SUMMARY OF FINDINGS

**FACILITY DESCRIPTION AND OPERATIONS (continued):**

THE INK STORAGE UNITS WITHIN ALL THE PRESSES ARE REMOVEABLE. THESE PAN TYPE UNITS ARE TAKEN TO ONE OF TWO "CLEAN-UP ROOMS" DEPENDING ON PHYSICAL LOCATION. THESE PANS ARE SUBMERSED IN METHYL ETHYL KETONE TO REMOVE THE INK FORMULATION. THESE VATS OF MEK ARE MAINTAINED IN THESE "CLEAN-UP ROOMS" UNTIL THE SOLVENT IS NO LONGER USEABLE. WHEN THIS OCCURES THIS MATERIAL IS DRUMMED AND REMOVED TO THE DISTILLATION ROOM FOR REPROCESSING. THE DISTILLATION ROOM IS A SHORT STORAGE TRAILER WHICH HOUSES A SMALL "BATCH TYPE" DISTILLATION UNIT. FROM THIS UNIT IS GENERATED CLEAN MEK AND STILL BOTTOMS. PRIOR TO 1987 THE FACILITY USED A WIDE VARIETY OF SOLVENTS FOR CLEANING EQUIPMENT. THESE INCLUDED: N-PROPYL ACETATE, ISO-PROPYL ALCOHOL, TOLUENE AND MEK. FROM 1987 ON THE PRIMARY SOLVENT IN USE HAS BEEN MEK. SMALL AMOUNTS OF N-PROPYL ACETATE ARE USED TO WIPE DOWN THE COPPER CYLINDERS. THE SOLVENT IS APPLIED TO A DISPOSABLE CLOTH.

THE STILL BOTTOMS FROM THE DISTILLATION OF THIS MEK ARE THE HAZARDOUS WASTE MANIFESTED OFF SITE. THIS MATERIAL HAS [redacted] HISTORICALLY BEEN CLASSIFIED AS D-001

AT THE TIME OF THIS INSPECTION THE FACILITY PLANT WORKERS WERE BEGINNING A PROJECT TO DRUM AND DISPOSE OF QUANTITIES OF OLD, UNUSEABLE SILK SCREEN INKS. THIS WORK WAS JUST BEGINNING, A WORKER WAS STARTING TO POUR THE FIRST OF

-A3-

**SUMMARY OF FINDINGS**

**FACILITY DESCRIPTION AND OPERATIONS (continued):**

THIS INTO 55 GALLON DRUMS. ERIC NEAVES STATED THAT THIS MATERIAL WILL BE SAMPLED AND ANALYZED TO DETERMINE THE PROPER WASTE CLASSIFICATION PRIOR TO SHIPMENT OFF-SITE. ALSO ON SITE ARE TWO (2) SAFETY-KLEEN PARTS CLEANER STATIONS, OWNED AND SERVICED BY THE SAFETY-KLEEN CORP. FACILITY PERSONEL STATED THAT NO OTHER HAZARDOUS WASTE STREAMS ARE GENERATED BY THE FACILITY. THE SMALL R&D LAB OPERATED ON SITE WILL GENERATE ONLY SMALL AMOUNTS OF MEK WHICH IS THAN TRANSFERRED TO THE DRUMS FOR DISTILLATION.

VIOLATIONS NOTED

NJAC 7:26-9.3 - ACCUMULATION OF HAZARDOUS WASTE IN CONTAINERS FOR GREATER THAN 90 DAYS. REFERS TO ONE DRUM ON STORAGE PAD DATED 1-25-88.

NJAC 7:26-9.4(a)6 - CONTAINER STORAGE AREA NOT INSPECTED DAILY. FACILITY PERSONAL STATED THAT THEY HAVE NO SOP IN EFFECT FOR THE DRUM PAD TO BE INSPECTED DAILY.

NJAC 7:26-9.4(a)6 iii - FACILITY MAINTAINS NO WRITTEN DESCRIPTION ON THE TYPE AND AMOUNT OF TRAINING RELATED TO HAZ. WASTE MGT. LAST RECORDS IN FILE ARE FROM 1985.

NJAC 7:26-9.6(d)1 - NO IMMEDIATE ACCESS TO COMMUNICATIONS OR ALARM DURING HANDLING OF HAZARDOUS WASTE. REFERS TO TWO (2) CLEAN-OUT ROOMS.

NJAC 7:26-9.3(d)1 - SATELITE ACCUMULATION AREA CONTAINS QUANTITY OF HAZARDOUS WASTE EXCEEDING 55 GALLONS. REFERS TO TWO (2) DRUMS BOTH NEAR CAPACITY AT SOLVENT RECOVERY AREA. DRUMS CONTAINED STILL BOTTOMS FROM DISTILLATION OF SPENT SOLVENTS. STILL OPERATES AS BATCH OPERATION, FACILITY REP. COULD NOT STATE

-B-

**Describe the activities that result in the generation of hazardous waste.**

CLEANING OF PRINTING PRESS EQUIPMENT WITH MEK AND TRACE AMOUNTS OF N. PROPYL ACETATE. HAZ. WASTE GENERATED FROM SOLVENT RECLAIMATION UNIT. SMALL STILL ON SITE MEK RECLAIMED, BOTTOMS GENERATED AND MANIFESTED OFF SITE TO DELAWARE CONTAINER. AT TIMES WASTE INK AND PAINTS MAY ALSO BE GENERATED

**Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)**

DRUM STORAGE AREA - AT TIME OF INSPECTION THERE WERE 7 DRUMS (55 GALLON - STEEL) STORED ON THE CEMENT PAD. THESE DRUMS WERE PROPERLY CLOSED, LABELED, AND DATED.

ALSO FACILITIES SATELITE ACCUMULATION AREA CONTAINED TWO (2) 55 GAL STEEL DRUMS, BOTH NEAR CAPACITY.

OF THE ABOVE SEVEN (7) DRUMS ONE (1) HAD AN ACCUMULATION DATE THAT EXCEEDED THE ALLOWABLE 90 DAY STORAGE LIMIT. DATE ON DRUM WAS 1/25/88 - INSPECTION DATE 5/2/88.

## GENERAL CHECKLIST

| GENERAL | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-7.4(a)1 | Does the Generator have an EPA ID number? | ✓ | | |
| **HAZARDOUS WASTE DETERMINATION** | | | | |
| 7:26-8.5(a) | Did the generator test its waste to determine whether it is hazardous? | ✓ | | |
| 7:26-8.5(b) | Did the generator determine the hazardous characteristics based upon knowledge of process? | ✓ | | |
| | Is the waste hazardous? | ✓ | | |
| 7:26-8.5(d) | Were test results, waste analysis, or other determinations made in accordance with this section kept for three years from the date that the waste was last sent to an on-site or off-site TSF? | ✓ | | |
| **MANIFESTS** | | | | |
| 7:26-7.4(a)4 | Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1). | ✓ | | |
| 7:26-7.4(a)4i | The generator's name, address and phone number. | ✓ | | |
| 7:26-7.4(a)4ii | The generator's EPA ID number. | ✓ | | |
| 7:26-7.4(a)4iii | The hauler(s) name, address phone number and NJ registration. | ✓ | | |
| 7:26-7.4(a)4iv | The hauler(s) EPA ID number. | ✓ | | |
| 7:26-7.4(a)4v | The name, address and phone number of the designated TSD facility. | ✓ | | |
| 7:26-7.4(a)4vi | The TSF's EPA ID number. | ✓ | | |
| 7:26-7.4(a)4v | The name, address and phone number of the designated TSD facility. | ✓ | | |
| 7:26-7.4(a)4vii | The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same? | ✓ | | |
| 7:26-7.4(a)4viii | Special handling instructions and any other information required on the form to be shipped by generator? | ✓ | | |

| | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-7.4(3) | Did the generator describe all N.O.S. wastes in Section J? | ✓ | — | — |
| 7:26-7.4(a)ix | When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest? | — | — | ✓ |
| 7:26-7.4(a)5 | Before allowing the manifested waste to leave the generator's property, did the generator: | ✓ | — | — |
| 7:26-7.4(a)5i | Sign the manifest certification by hand? | ✓ | — | — |
| 7:26-7.4(a)5ii | Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest? | ✓ | — | — |
| 7:26-7.4(a)5iii | Retain one copy and forward one copy to the state of origin and one copy to the state of destination? | ✓ | — | — |
| 7:26-7.4(a)5iv | Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator? | ✓ | — | — |
| 7:26-7.4(a)5v | Give the remaining copies of the manifest form to the hauler? | ✓ | — | — |
| 7.26-7.4(f) | Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis) | ✓ | — | — |
| 7:26-7.4(h)1 | Has the generator received signed copies of portion B (from the TSD facility ) of all manifests for waste shipped off site more than 35 days ago? | ✓ | — | — |
| 7:26-7.4(h)1 | If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDEP of the situation? | — | — | ✓ |
| 7:26-7.4(h)2 | Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago? | — | — | ✓ |

7:26-9.3 **Accumulation Time**

**How is waste accumulated on site?**

(X) Containers
(__) Tanks (greater than 90 days)
(complete HWMF (TSD) Facility Checklist)
(__) Tanks (less than 90 days)
(__) Above ground
(__) Below ground
(__) Surface impoundments
(complete HWMF (TSD) Facility Checklist)
(__) Piles (complete HWMF checklist)

| | YES | NO | N/A |
|---|---|---|---|
| 7:26-9.3(a)1 Is waste accumulated for more than 90 days? | ✓ | — | — |

AT THE TIME OF THIS INSPECTION THERE WAS ONE (1) 55 GAL. DRUM ON THE PAD LABELED "HAZARDOUS WASTE" AND DATED 1-25-88

**STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSF) CHECKLIST IS FILLED OUT.**

Short term accumulation standards for generators who accumulate waste in containers and tanks for 90 days or less:

| | | YES | NO | N/A |
|---|---|---|---|---|
| **Containers** | | | | |
| 7:26-9.4 | What type of containers are used for storage. Describe size, type, quantity, and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone). 55 GALLON STEEL DRUMS OF STILL BOTTOMS FROM THE DISTILLATION OF SPENT MEK | — | — | — |
| 7:26-9.4(d)2 | Do the containers appear to be in good condition, not in danger of leaking? | ✓ | — | — |
| | If no, describe the problem (include number of containers involved.) | | | |
| 7:26-9.4(d)4i | Are all containers securely closed except those in use? | ✓ | — | — |
| 7:26-9.4(d)4iii | Do the containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing and/or leaking? - CEMENT PAD WITH CONTAINMENT AND SUMP. | ✓ | — | — |
| 7:26-9.4(d)4iv | Are containerized hazardous wastes segregated in storage by waste type? ONE WASTESTREAM AT TIME OF INSPECTION | — | — | ✓ |
| 7:26-9.4(d)4v | Is every container arranged so that its identification label is visible? | ✓ | — | — |
| 7:26-9.4(d)5 | Is the container storage area inspected at least daily? - VIOLATION NOTED. | — | ✓ | — |
| 7:26-9.4(d)6 | Are containers holding ignitable and reactive wastes located at least 50 (fifty) feet (15 meters) from the facilities property line? | — | — | ✓ |
| 7:26-7.2(a) | Did the owner/operator conspicuously label appropriate manifest number on all hazardous waste containers that are intended for shipment? | ✓ | — | — |
| 7:26-9.3(a)3 | Is each container clearly dated with each period of accumulation so as to be visible for inspection? | ✓ | — | — |

| | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-7.2(b) | Did the owner/operator insure that all containers used to transport hazardous waste off site are in conformance with applicable DOT regulations? (49CFR 171, 179) | ✓ | | |

**Tanks** (Less than 90 day storage) – NO TANKS FOR STORAGE OF HAZ. WASTE

| | | | | |
|---|---|---|---|---|
| 7:26-9.3(b) | Does the generator accumulate hazardous waste on-site in an above ground tank? | | ✓ | |
| | If yes, describe the tank(s):<br>1) Capacity _____<br>2) Shell thickness _____<br>3) Material Construction _____<br>4) Age of tank _____ | | | |
| 7:26-9.3(b) | Does the generator have written approval from the Department to store hazardous waste(s) in this tank(s) for ninety days or less? | | | |
| 7:26-9.3(b)1 | Does each tank(s) have sufficient shell thickness to ensure the tank will not collapse or rupture as specified by the Department? | | | |
| 7:26-9.3(b)4 | Is the tank(s) designed so that at least 99% of the volume of each of the tanks can be emptied by direct pumping or drainage? | | | |
| 7:26-9.3(b)5 | Is each tank(s) rendered empty (1% or less remaining) every 90 days or less? | | | |
| 7:26-9.3(b)6 | Are all wastes removed from the tank(s) shipped off-site to an authorized facility or placed in an on-site, authorized facility? | | | |
| 7:26-9.3(b)8 | If part of the tank is below grade, is it constructed to allow visual inspection of the tank, comparable to a totally above-ground tank and is is secondary containment provided for the below grade part? | | | |
| 7:26-10.5(c)1 | Are materials which are incompatible with the material of construction of the tank(s) placed in the tank(s)? | | | |
| 7:26-10.5(c)2 | Does the generator use appropriate controls and practices to prevent overfilling? | | | |

| | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-10.5(c)2ii | For uncovered tanks, is there sufficient (two feet or acceptable documentation) freeboard to prevent overtopping by wave or wind action by or precipitation? | | | |
| 7:26-9.3(b)3 | Does each tank(s) or storage tank area have secondary containment? | | | |
| 7:26-10.5(d)1 | Is the containment system capable of collecting and holding spills, leaks, and precipitation? | | | |
| 7:26-10.5(d)1i | Is the base underlying the tank(s) free from cracks, gaps, and sufficiently impervious to contain leaks, spills, and accumulated rainfall until the collected material is detected and removed? | | | |
| 7.26-10.5(d)ii | Does the containment system consist of material compatible with the wastes being stored? | | | |
| 7:26010.5(d)iii | Is the containment system sloped or otherwise designed to efficiently drain and remove liquids resulting from leaks, spills and precipitation? | | | |
| 7:26-10.5(d)iii | Is the tank protected from contact with accumulated liquids? | | | |
| 7:26-10.5(d)iv | Does the containment system have sufficient capacity to contain ten percent of the volume of all tanks or the volume of the largest tanks whichever is greater? | | | |
| 7:26-10.5(d)2 | Is run-on into the containment area prevented? | | | |
| | If not, explain. | | | |
| 7:26-10.5(d)3 | Is precipitation removed from the pump or collection area in a timely manner to prevent blockage or overflow of the collection system? | | | |
| 7:26-10.5(d)4 | Is spilled or leaked waste removed from the pump or collection area daily? | | | |

| | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-10.5(d)4i | If the collected material is hazardous waste under NJAC 7:26-8, it is managed as a hazardous waste in accordance with all applicable requirements of this chapter? | — | — | ✓ |
| 7:26-9.4(g)4 | <u>Personnel Training</u><br><br>Have facility personnel successfully completed a program of classroom instruction or on-the-job training since six months after the date of their employment or assignment to the facility or to a new position at the facility? | ✓ | — | — |
| 7:26-9.4(g)5 | Has facility personnel taken part in an annual review of initial training? | ✓ | — | — |
| 7:26-9.4(g)2 | Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan to implementation) relevant to the positions in which they are employed? | ✓ | — | — |
| | Is there written documentation of the following: | | | |
| 7:26-9.4(g)6i | Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job? | ✓ | — | — |
| 7:26-9.4(g)6ii | A written job description for each position related to hazardous waste management? | ✓ | — | — |
| 7:26-9.4(g)6iii | A written job description on the type and amount of both introductory and continuing training that has been and will be given to personnel in jobs related to hazardous waste management? | — | ✓ | — |
| 7:26-9.4(g)6iv | Documentation of actual training or experience received by personnel? DOCUMENTATION UP TO AND INCLUDING 1985 | ✓ | — | — |
| 7:26-9.4(g)7 | Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment? | ✓ | — | — |

| | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-9.6 | **Preparedness and prevention** | | | |
| | Does the facility comply with preparedness and prevention requirements including maintaining: | | | |
| 7:26-96(b)1 | An internal communications or alarm system? - THROUGHOUT MFG PORTION OF FACILITY | ✓ | — | — |
| 7:26-9.6(b)2 | A telephone or other device to summon emergency assistance from local authorities? | ✓ | — | — |
| 7:26-9.6(b)3 | Portable fire equipment, spill control equipment, and decontamination equipment? | ✓ | — | — |
| 7:26-9.6(b)4 | Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system? CITY WATER | ✓ | — | — |
| 7:26-9.6(c) | Is equipment tested and maintained? | ✓ | — | — |
| 7:26-9.6(d)1 | Is there immediate access to communications or alarm systems during systems during handling of hazardous waste? - VIOLATION NOTED. NOT IN TWO CLEAN-UP ROOM WHERE WASTE MAY GENERATED. | — | ✓ | — |
| 7:26-9.6(e) | Adequate aisle space (18") to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment? | ✓ | — | — |
| | If no, please explain. | | | |
| | In your opinion, do the types of waste on site require all of the above procedures, or are some not required? | ✓ | — | — |
| | Explain. | | | |
| 7:26-9.6(f) | Has the facility made the following arrangements, as appropriate for the type waste handled on site: | ✓ | — | — |
| 7:26-9.6(f)1 | Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled - associated hazardous places where facility personnel would normally be working, entrances and roads inside facility and possible evacuation routes. | ✓ | — | — |

| | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-9.6(f)2 | Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority? PITMAN HAS JURISDICTION | ✓ | | |
| 7:26-9.6(f)3 | Agreements with emergency response contractors, and equipment supplies? | ✓ | | |
| 7:26-9.6(f)4 | Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosion, or discharges at the facility? | ✓ | | |
| 7:26-9.6(f)5 | Arrangement with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually? | ✓ | | |
| 7:26-9.6(f)6 | If authorities identified in (f)1 through 5, above decline to enter into such arrangements, has the owner, or operator documented this refusal in the operating record. | ✓ | | |
| 7:26-9.4(g)8 | Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7.26-9.7? | ✓ | | |
| 7:26-9.4(g)8i | If no, did the owner or operator petition the Department for an exemption from the semi annual drills requirement? | | | ✓ |
| 7:26-9.4(g)8ii | Did the owner or operator petition the Department for an exemption excluding some or all local officials in the semi annual drill requirements? | | ✓ | |
| | If yes, did the owner operator provide those specific local officials with written approval of the exemption? | | | ✓ |

| | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-9.7 | Contingency Plan and Emergency Procedures | | | |
| 7:26-9.7(a) | Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents into air, soil or surface water? | ✓ | | |
| 7:26-9.7(b) | Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? | ✓ | | |
| 7:26-9.7(c) | Does the contingency plan describes the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility? | ✓ | | |
| 7:26-9.7(d) | Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 300 or a Discharge Prevention Containment and Countermeasure (DPCC) Plan in accordance with N.J.A.C. 7:1E-4.1 et seq. | | ✓ | |
| | If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section? | | | ✓ |
| 7:26-9.7(e) | Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services? | ✓ | | |

| | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-9.7(f) | Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be names as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates? | ✓ | | |
| 7:26-9.7(g) | Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where this equipment is required? Is the list up-to-date? In addition, does the plan include the location and physical description of each item on the list, and a brief outline of its capabilities? | ✓ | | |
| 7:26-9.7(h) | Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in case where the primary routed could be blocked by releases of hazardous waste or fires)? | ✓ | | |
| 7:26-9.7(i) | Is a copy of the contingency plan and all revisions to the plan: | | | |
| | 1. Maintained at the facility; | ✓ | | |
| | 2. Has the contingency plan been submitted to local authorities (police fire departments, emergency response teams)? | ✓ | | |
| 7:26-9.7(k) | Is there an employee on site or on call at all times with the responsibility of coordinating, all emergency response measures? | ✓ | | |

COPY A-1


**Delaware Container Co., Inc.**

CHEMICAL WASTE REMOVAL SERVICE
FUEL EXTENDERS
STEEL DRUMS

W. 11TH AVENUE & VALLEY ROAD
COATESVILLE, PA 19320

PHONE: (215) 383-6600


REF #: 5141, Report Requested: 3/18/86, Completed: 3/27/86

Generator: Decorating Resources, Inc.
Street Address: 430 Andbro Drive, Box 299
City, State: Pitman, N.J. 08071
EPA ID #: NJD 064362379
manifest # (if applicable): N/A
Generator's common name for waste: Flammable hazardous sludge

| Analytical Parameter | Results |
|---|---|
| - Total Residue @ 103-5 °C, two hr. | 23.05% |
| - Heat Value | 96117 BTU/GAL |
| - Specific Weight | 0.96 SP.6R. |
| - TOX, reported as Chlorine | 0.73% |
| - Ash @ 550-600 °C, for one hour | 1.91% |
| - Sulfides | 0.88% |
| - PCB's, ppm | <10 |
| - Flash Point °F | <65 |
| - Silver, Ag, total, mg/l | 1.15 |
| - Aluminum, Al, total, mg/l | 117.0 |
| - Arsenic, As, total, mg/l | 0.12 |
| - Barium, Ba, total, mg/l | 108 |
| - Cadmium, Cd, total, mg/l | 1,340 |
| - Chromium, Cr, total, mg/l | 1.3 |
| - Copper, Cu, total, mg/l | 2,380 |
| - Mercury, Hg, total, mg/l | 0.115 |
| - Iron, Fe, total, mg/l | 31.0 |
| - Manganese, Mn, total, mg/l | 0.55 |
| - Nickel, Ni, total, mg/l | 1.15 |
| - Lead, Pb, total, mg/l | 2.5 |
| - Selenium, Se, total, mg/l | 0.13 |
| - Zinc, Zn, total, mg/l | 1,380 |

Note: N.R. means NOT REQUESTED BY GENERATOR

Respectfully submitted,

DELAWARE CONTAINER CO., INC.

Peter A. Massaro
Peter A. Massaro
Laboratory Supervisor

Bu[illegible] of Waste Management
P. O. Box 2063
Harrisburg, PA 17120

MAR 25 19[illegible]

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)
ER-SWM-51:REV. 10/84 Form Approved. OMB No. 2000-0404. Expires 7-31-86

**UNIFORM HAZARDOUS WASTE MANIFEST**

1. Generator's US EPA ID No. NJD065435237 Manifest Document No. 69576

2. Page 1 of 1 Information in the shaded areas is not required by Federal law is required by State law.

3. Generator's Name and Mailing Address
DECORATING RESOURCES INC.
430 ANDBRO DRIVE
PITMAN NJ 08071

4. Generator's Phone

A. State Manifest Document Number PAB 2666764

B. State Gen. ID SAME

5. Transporter 1 Company Name: DELAWARE CONTAINER CO. INC.
6. US EPA ID Number: PAD065375470
C. State Trans. ID PA-AH
NJ DEPS-#4007 TRUCK 0032 DECAL #[illegible]

7. Transporter 2 Company Name
8. US EPA ID Number
D. Transporter's Phone (215) 383-6600
E. State Trans. ID PA-AH

9. Designated Facility Name and Site Address
DELAWARE CONTAINER CO., INC.
W. 11th AVE & VALLEY RD
COATESVILLE, PA. 19320
10. US EPA ID Number: PAD064375470
F. Transporter's Phone ( )
G. State Facility's ID Not Required
H. Facility's Phone (215) 383-6600

| 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) | 12. Containers No. | Type | 13. Total Quantity | 14. Unit Wt/Vol | I. Waste No. |
|---|---|---|---|---|---|
| a. RQ WASTE FLAMMABLE LIQUID N O S FLAMMABLE LIQUIDS UN 1993 (D001) (n. PROPYLACETATE, TOLUOL)(INK & PAINT SLUDGE 015DM | | | 00825 | G | Possible-Y misclassified D001 |
| b. | | | | | |
| c. | | | | | |
| d. | | | | | |

J. Additional Descriptions for Materials Listed Above (include physical state and hazard code)
a. Haz. Code: T Physical State: L RF #5141
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a. S01
b.
c.
d.

15. Special Handling Instructions and Additional Information
TR# 78969
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Form Approved OMB No. 2050-0039 9/30/88 8700-22 9/86

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and all applicable State laws/regulations.

GENERATOR
Printed/Typed Name: CARL K HOMAN
Signature: Carl K Homan
Date: Month 03 Day 21 Year 88

TRANSPORTER
17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: JERRY A GORDON
Signature: Jerry A Gordon
Date: Month 03 Day 21 Year 88

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month . Day . Year .

FACILITY
19. Discrepancy Indication Space Section 4 - Generator phone no. 609-589-3800
Discrepancy confirmed via phone with the generator. FM @ DEC

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: LINDA L. MILLER
Signature: Linda L. Miller
Date: Month 03 Day 21 Year 88

In case of an emergency or spill immediately call the National Response Center (800) 424-8802 and the PA Department of Environmental Resources

PAB 2666764

Divisions
AndBro — Color-Dec
Hydro GraFix Inc.

(609) 589-3800
TWX 510-686-7530
Customer Service 800-257-7474

DECORATING RESOURCES Inc.
430 AndBro Drive, PO Box 299, Pitman, New Jersey 08071

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
5th Fl., 401 E. States Street
Trenton, NJ 08625

Attn: Mr. Jack R. Allen/Investigator

Subj: Corrective Measures Regarding Violations Imposed During Your Recent Inspection Visit (May 2, 1988).

NJAC 7:26-9.3-90 Day Accumulation of Hazardous Waste
NJAC 7:26-9.4(d)-Daily Inspection of Storage Area

A daily inspection system has been inplemented and will include the maintaining of a signed log book with a label date, check to track number of days each drum has been on site. Log will be kept and inspected by R&D Technical Staff.

NJAC 7:26 9.4(g)6iiii-written discription of training.

This file will be updated to include recent past training of officers during OFF-SITE courses.

Examples
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Carl Homan-Hazardous/Toxic Waste Management:
Laws, Compliance Procedures and New Technologies.

Syska & Hennessy course at Rutgers, New Brunswick
July 20-21 1987

Brian Anderson and Dave Fields-Environmental Laws & Real Estate.

Lion Technology Inc. Training Course at Cherry Hill, New Jersey. April 13, 1988.

Courses to be attended inthe near future.

Example
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Carl Homan and Dave Fields-Preparing and Shipping Hazardous Waste Substances Training Workshops-1988.

Lion Technology Inc. Training in Philadelphia, PA. (October 1988)

Also In-House Training under our N.J. "Right To Know" Compliance Program.

NJAC 7:26-9.6(d)i-Access To Alarm Communication In Our Clean Up Rooms.

Our Engineering and Maintainance Department will install a Pull Cord or Chain Alarm System, activating a Bell System in the Main Production area at both wash up room sites in the Color-Dec Unit.

All above items to be completed by May 16, 1988.

Sincerely,

Eric Neaves
Director of Reserch

EN/tjk
CC: Brian Anderson
Scott Anderson
Dave Fields
Carl Homan
Dan Spaeth
Tom H. Moy U.S.- E.P.A.
James Sanderson U.S.-E.P.A.

A-4

TRAINING:
PROGRAM IS DIRECTED
BY A QUALIFIED PERSON

THE STATE UNIVERSITY OF NEW JERSEY
# RUTGERS

Graduate School of Management • Office of Management Development
92 New Street • Newark • New Jersey 07102 • 201/648-5814



May 6, 1988

Mr. Carl Homan
Decorating Resources, Inc.
430 Andbor Drive
Pitman, N.J. 08071

Dear Mr. Homan:

This is to confirm that CARL HOMAN has completed the course " Hazardous Toxic Waste Management: Laws, Compliance, Procedures and New Technologies," offered by the Rutgers University Continuing Business Studies Program in Princeton on July 20 and 21, 1987.

Yours truly,

Anita Meritt

Anita Meritt, Administrator
Office of Management Development
Graduate School of Management
Rutgers University

Eric

# Certificate Of Achievement

EL & RE

*This certificate has been awarded to*

**W. Brian Anderson**

*at*

**Cherry Hill, New Jersey**

*For successfully completing the Lion Technology Inc. Certification Workshop on the management of real property and real property transfers under Federal and State environmental laws and applicable regulations of the N.J. Department of Environmental Protection.*

*This training completed as of*

**13th April 1988**

W P Taggart
INSTRUCTOR

LION TECHNOLOGY INC.